

GDI

Sunnyvale General Devices and Instruments Inc.

Traffic Electronics Manufacturer ♦ Specializing in Communications

May 14, 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Room 222
1919M Street NW
Washington DC 20554

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MAY 15 1997

FCC MAIL ROOM

Re: Rules and Policies for Local Multipoint Distribution Service (LMDS) CC Docket No. 92-297

Dear Mr. Caton:

I am writing on behalf of **Sunnyvale General Devices & Instruments, Inc. (GDI)** in support of the Petition for Partial Reconsideration filed in this docket by Sierra Digital Communications, inc. on May 5, 1997.

General Devices and Instruments, Inc. (GDI) was founded in 1974 to design and manufacture modems for the Traffic industry. In 1990 GDI expanded its operation to the sales and installation of Millimeter Wave transmission equipment for the domestic Traffic markets.

GDI employs an engineering and customer service staff to design and develop Millimeter Wave transmission systems. It also does light manufacturing which includes assembly of electronic and machined components, testing and evaluation of the individual components and design verification testing and final testing of the completed sub-assemblies and systems.

Management at GDI has set two (2) major corporate goals. The first is to develop a line of communications products which addresses short haul low cost communication networks for data, voice and video. The primary focus is to provide cost effective equipment needed for the commercial communication network market. This is not, in our opinion, being addressed by existing microwave equipment manufacturers. Other microwave transmission products sold in this market incorporate high data rate equipment with many costly features. GDI, on the other hand, has developed a range of products which utilize low cost Millimeter Wave technology with features that optimize performance vs. cost criteria for each application.

The second goal is to penetrate significant niche communications markets which is economically shielded from each other and individually distinct in terms of application. They are traffic control networks, telephone T1/E1 carrier networks, local area networks for computer systems, interconnect of PBX's and video transmission systems.

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GDI's current market penetration includes the federal, state and local traffic industry, the broadcast quality video transmission business, Local Area Network (LAN) system operators, cellular, PCN/PCS service providers and private communication network operators. The common need in each of the market segments is for short paths, low power, low cost wireless analog and/or digital communication links which provide voice, data and video in the frequency bands we provide.

With a 20 plus year history of dependable, cost effective products and customer service that goes beyond the call of duty, GDI brings to the world of wireless a customer base that relies upon the integrity of the management.

The availability of the 31 GHz, low power Microwave equipment has provided an inexpensive and reliable wireless solution for installing Traffic Intersection coordination and Video surveillance to the various States Department of Transportation without the expensive and intrusive disruption of digging trenches through the corridors of our Cities.

We rely on the 31 GHz band for public safety applications, and must be able to expand our operations to protect the public. We *have* no suitable alternatives to 31 GHz. The FCC's plans to allocate 31 GHz to LMDS will significantly impair public safety operations in our area. The result will be increased traffic congestion, more hazardous road conditions, increased air pollution, and increased expenditures for new road construction.

The FCC's suggestion that we bid for an LMDS license is not realistic. As a educational entity, we cannot justify raising that large amount of capital at public expense. And the suggestion that we take service from the local LMDS operator would make our public safety operations dependent on a commercial company. We risk the provider cutting us off and serving someone else instead for higher profits

In conclusion, we know from our own experience that the 31 GHz operations are in the public interest. We need the flexibility to expand our operations to meet public safety needs in the future. For that reason we support Sierra's *Petition* for Partial Reconsideration.

Respectfully submitted,



Franklin R. Ribelin
President

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